

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

25-CV-6038

-v-

\$5,002.00 SEIZED FROM ROBINHOOD MARKETS,
INC. ACCOUNT NUMBER 578853509;

\$5,005.19 SEIZED FROM ROBINHOOD MARKETS,
INC. ACCOUNT NUMBER 818393654; AND

\$10,000.05 SEIZED FROM ROBINHOOD MARKETS,
INC. ACCOUNT NUMBER 696647072

Defendants *in rem*.

VERIFIED COMPLAINT FOR FORFEITURE

The United States of America, by its attorneys, Trini E. Ross, United States Attorney for the Western District of New York and Elizabeth M. Palma, Assistant United States Attorney, of counsel, for its Verified Complaint for Forfeiture herein alleges as follows:

CAUSE OF ACTION

1. This is a civil forfeiture action *in rem* pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 984 for the forfeiture of funds from Robinhood Markets, Inc., account numbers 57885309 (\$5,002.00 United States currency), 818393654 (\$5,005.19 United States currency) and 696647072 (\$10,000.05 United States currency), which were frozen at Robinhood Markets, Inc. on or about August 21, 2024, and seized pursuant to seizure warrants signed by Magistrate Judge Marian Payson (collectively, hereinafter the “Defendant Funds”).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to Title 28, United States Code, Section 1345 and over an action for forfeiture pursuant to Title 28, United States Code, Section 1355(a).

3. This Court has *in rem* jurisdiction pursuant to Title 28, United States Code, Section 1355(b) because the acts or omissions giving rise to the forfeiture occurred in the Western District of New York.

4. Venue is properly premised in the Western District of New York pursuant to Title 28, United States Code, Section 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in the Western District of New York and Title 28, United States Code, Section 1395, because the Defendant Funds are currently in the custody of the United States Marshals Service for the Western District of New York.

FACTUAL ALLEGATIONS

5. The facts and circumstances supporting the forfeiture of the Defendant Funds are contained in the Affidavit of Jordan F. Slavik, Special Agent with the Federal Bureau of Investigations, a copy of which is attached hereto as Exhibit 1 and incorporated as though fully set forth herein, and has been provided to the Court with an application that it remain under seal until further order of the Court.

CONCLUSION AND REQUEST FOR RELIEF

12. Based on all of the foregoing facts, the circumstances surrounding these facts, and the experience and training of the law enforcement officers involved, there is a reasonable

belief that the Defendant Funds are subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) as proceeds of specified unlawful activity, specifically Wire Fraud and Bank Fraud in violation of Title 18, United States Code, Sections 1343 and 1344; and Title 18, United States Code, Section 984. Pursuant to Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1), Wire Fraud and Bank Fraud constitute specified unlawful activities.

WHEREFORE, the United States of America respectfully requests that:

- (1) an arrest warrant *in rem* be issued for the arrest of the Defendant Funds;
- (2) all persons having any interest therein be cited to appear and show cause why the forfeiture should not be decreed;
- (3) a judgment be entered declaring the Defendant Funds condemned and forfeited to the United States of America for disposition in accordance with the law;
- (4) the costs of this suit be paid to and recovered by the United States of America; and
- (5) the Court grants such other and further relief as deemed just and proper.

DATED: January 16, 2025
Buffalo, New York.

TRINI E. ROSS
United States Attorney
Western District of New York

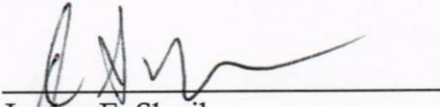
/s/ Elizabeth M. Palma

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STATE OF NEW YORK)
COUNTY OF MONROE) ss.:
CITY OF ROCHESTER)

Special Agent Jordan F. Slavik, being duly sworn, deposes and says:

I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and I am familiar with the facts and circumstances surrounding the funds in Robinhood Markets, Inc., account numbers 57885309 (\$5,002.00 United States currency), 818393654 (\$5,005.19 United States currency) and 696647072 (\$10,000.05 United States currency). The facts alleged in the Verified Complaint *in rem* are true to the best of my knowledge and belief based upon my personal knowledge and information furnished to me by officers and agents of the FBI and provided to the officials of the United States Department of Justice.


Jordan F. Slavik
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on January 16, 2025.


Notary Public

